

unsealed  
11/9/06  
fmr

~~SEALED~~ ORIGINAL (51)

IN THE "UNITED" STATES OF "DISTRICT" COURT  
FOR THE STATES OF "DELAWARE

CURTIS M. COLLINS  
PLAINTIFF

\*

CA.

5-739-SLR:

\*

V.  
WARDEN ET AL

\*

RECK KEARNZY

\*

S. S. T. CHANDLER

\*

C. Berezansky

\*

M. H. HIGANT

\*

\* NOW COMES THE PLAINTIFF CURTIS M. COLLINS \*  
TO DEPOSE DEFENDANTS "WITH THESE  
WRITTEN" QUESTION TO "THE COURT'S

2006 OCT -4 PM 12:22  
RD scanned  
U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

C/O BEREZANSKY

1\* IS IT TRUE THAT YOU HAVE A "HISTORY" OF CAPSTUNTING INMATES BEFORE AND AFTER THEY ARE "HANDCUFFED" AT S.C.I. PRISON

#2 IS IT TRUE THAT 90% OF YOUR DISCIPLINARY REPORTS ON INMATES ACCURE "AT CHOW TIMES FEEDING THE INMATES AT S.C.I. PRISON"

#3 WORKING AS A CORRECTIONAL OFFICER FOR THE ~~STATE~~ STATE OF DELAWARE HAVE YOU EVER BEEN PLACED ON LEAVE PENDING ANY INVESTIGATION CONCERNING ABUSE IN INMATES AT S.C.I. PRISON.

#4 WORKING AS A CORRECTIONAL OFFICER FOR THE STATE OF "DELAWARE" HAVE YOU BEEN SUED BY AN "INMATES AT S.C.I. ACCUSING YOU OF ABUSE OR THREATENING BEHAVIOR, IF SO COULD YOU PLEASE STATE FOR THE RECORD HOW MANY TIMES YOU BEEN SUED OR ACCUSED OF INMATES ABUSE OF ANY OTHER THREATENING BEHAVIORS BY INMATES HOUSED AT S.C.I. PRISON.

5# IS IT TRUE THAT 82% PERCENT OF YOUR DISCIPLINARY REPORTS FILED ON INMATES ARE AFRICAN AMERICAN "INMATES AT S.C.I. PRISON"

#6# 90% BEFEZANSKY

IS IT TRUE THAT OUT OF 90% PERCENT!  
OF YOUR INMATES ARE "WITH" AFRICAN  
AMERICAN "INMATES" RESOLVES" IN THEM  
BEING ASSAULTED" BY YOU CAPSTON! BY YOU  
BEFORE AND AFTER" THE INMATES ARE ALREADY  
IN HANDCUFFS.

#7# Sir

CAN YOU PLEASE TELL THE "COURTS WHY YOU  
<sup>AT</sup> RAN MR. COLLINS IN THE CHOW HALL AND"  
ASSAULTED MR. COLLINS BY PUNCHING MR. COLLINS  
IN THE FACE IN FRONT OF A BUNCH OF OTHER  
INMATES IN THE S.C.I. CHOW HALL

#8 IS IT TRUE THAT YOUR JOB IS TO BE A  
PROFESSIONAL OFFICER'S

#9 WELL CAN YOU PLEASE TELL THE COURTS  
WHY YOU USED PROFANITY ALL THE TIMES  
WHEN TALKING TO INMATES

#10# HAVE YOU EVER BEEN ASSAULTED OR ABUSED  
IN THE PAST BY AN AFRICAN AMERICAN  
MALE" WHILE YOU WERE OUT OF UNIFORM  
OR IN UNIFORM.

③

C/O MILLIGAN

CAN YOU PLEASE STATE AND OR DESCRIBE WHAT TRANSPIRED ON 8-6-05 IN THE

① # M.S.B. Chowhall BETWEEN YOU AND THE PLAINTIFF CURTIS COLLINS

② # AFTER THIS SO CALLED ALTERCATION BETWEEN YOU AND THE PLAINTIFF IS IT TRUE THAT AFTER THE PLAINTIFF WAS HANDCUFFED AND SUBDUED WAS IT NECESSARY IN YOUR EYES TO CONTINUE TO BEAT THE PLAINTIFF AND SPRAY THE PLAINTIFF WITH TWO CANS OF PEPPERS SPRAYS?

# ③ HAVE YOU EVER SEEN A INCIDENT LIKE THIS BEFORE?

④ # OK HAVE YOU EVER LAID YOUR HANDS ON ANY OTHER INMATE BEFORE WHILE THAT PERSON HAS BEEN SUBDUED IN HANDCUFFS

# ⑤ ALSO WHAT IS YOUR DEMEANOR TOWARDS OTHER INMATES AT THE PRISON?

C/O MILLIGAN

#⑥#

ISNT IT TRUE THAT PROTOCOLLY YOU FOLLOW  
OR ALLOWS YOU TO PLACE HANDS ON A INMATE  
BUT ONCE THAT INMATE IS SUBDUED YOU MUST  
STOP! WHY THEN YOU CONTINUE TO HIT AND OR  
CAUSE THE PLAINTIFF INJURIES WHILE HE  
WAS IN HANDCUFFS" AND SUBDUED LAYING  
FACE DOWN ON THE FLOOR?

#⑦#

IS IT TRUE ON SET PROTOCOLLY THE PLAINTIFF  
WAS ON THE GROUND AND DID NOT RESIST IN  
ANY WAY CAN YOU PLEASE TELL THE COURTS  
WHY? OR HOW THE PLAINTIFF GOT BROKEN,  
RIBS AND A BUSTED LIP WHEN IN FACT THE  
THE PLAINTIFF WAS RESISTING IN ANY  
WAY?

#⑧#

SIR" ON THE STREETS DO YOU CONSIDER  
YOURSELF "A" VIOLENT PERSON?

#⑨#

WELL CAN YOU DESCRIBE YOUR ACTION IN  
M.S.B. CHOWHALL "WHILE BEATING A"  
INMATE UP AND DOWN IN FRONT OF A  
BUNCH OF OTHER INMATES?

#⑩#

ALSO FOR THE RECORD WITH ALL THESE SERIOUS  
QUESTIONS THAT WAS ASKED HERE TODAY WOULD YOU  
BE WILLING TO TAKE A "BIG LIE DETECTOR" TEST!

Sgt.

Sgt. CHANDLER

# ①

THE PLAINTIFF "SEEN YOU WHILE HE WAS  
Laying on THE ground, AND I NOTICED  
THAT YOU WAS STANDING THERE LAUGHING YOUR  
HEAD 'OFF AT THE SITUATION INSTEAD OF  
STOPPING UNFAIR TREATMENT TOWARDS A  
INMATE WHY THEN DIDN'T YOU "SGT" PUT A  
STOP TO WAS HAPPENING?

# ②

Sgt.

HAVE YOU EVER SEEN OR HEARD A FELLOW  
OFFICERS WASH OUT AT A INMATE BECAUSE  
OF 'FAMILY PROBLEMS?

# ③

Sgt. IS IT TRUE WHEN PLAINTIFF COLLINS  
CAME TO YOU ABOUT A UNPROFESSIONAL  
OFFICER'S BEREZANSKY BEING OUT OF  
CONTROL?

# ④

Sgt.

IS IT TRUE THAT OFFICER BEREZANSKY  
RAN TOWARDS THE PLAINTIFF IN THE  
"CHOWHALL" AND ASSAULTED THE PLAINTIFF  
BY PUNCHING THE PLAINTIFF IN THE FACE  
FOR NO REASON AT ALL?



Sgt.

Sgt. CHANDLER

#5

IS IT THE TRUTH "WHEN AN INMATE" GET SERIOUSLY "HURT, THEY MUST IMMEDIATELY BE TAKEN TO MEDICAL IN ANY EMERGENCY SITUATION?"

#6

WHY THEN DIDN'T YOU SEE THAT THE PLAINTIFF GOT PROPER MEDICAL TREATMENT?

#7

Sgt. IS IT TRUE YOU HAVE A PERSONAL VENDETTA AGAINST THE PLAINTIFF? OR YOU JUST DON'T CARE ABOUT THE WELL BEING OF INMATES?

#8

Sgt.

ALSO IS THE TRUTH THAT "S.C.I. IS A REAL "RETAIL" PRISON?"

#9

OK" FOR THE RECORD WITH ALL THESE SERIOUS QUESTION THAT WAS ASKED HERE TODAY WOULD YOU BE WILLING TO TAKE A BIG LIE DETECTOR TEST!

#10

IS IT TRUE THAT ANY OFFICER WITH A HIGH RANK IS TO TAKE CHARGE WITHOUT ANY OFFICER WITHOUT NO RANK YOU WERE THE ONLY HIGH RANK IN THE CHOWHALL WHY YOU, DIDN'T YOU TAKE CHARGE OF THE SITUATION!

CERTIFICATE OF SERVICES

I  
CURTIS M. COLLINS  
hereby

CERTIFY THAT ON THIS 10  
DAY OF 2-06 I HAVE

HONDED "THESE" WRITTEN QUESTIONS TO DEPOSE  
DEFENDANTS TO A DELAWARE CORRECTIONAL  
CENTER PRISON GUARDS TO PLACE SAID WRITTEN  
QUESTIONS TO DEPOSE IN A D.C.C. UNITED STATES  
MAILING SYSTEM IN A PRE-PAID ENVELOPE  
TO BE SENT TO THE DELAWARE DISTRICT COURT

AND:

\*DEPUTY ATTORNEY GENERAL  
D.E.P.T.  
OF "JUSTICE" CARVER STATE  
OFFICE B.H.D.G. 820 N.  
French ST. WILM/DEL 19801

\*  
CLERK UNITED STATES  
DISTRICT COURT 844  
N. KING STR. LOCKBOX 18  
WILM/DEL 19801-3570

\*S.B.D. 314128

By CURTIS M. COLLINS

D.C.C. B.H.D.G. 217 TIER C.U.3  
1181 PADDOCK ROAD SMYRNA DEL

19977



VM CURTIS M. COLLINS  
SBI# 314128 UNIT C-11-3 B.L.D.-21  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



LEGAL-MAIL

\*CLERK\*

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\* UNITED STATES DISTRICT COURT \*  
OF DELAWARE 844 NORTH  
KING STREET LOCKBOX #18  
WILMINGTON DELAWARE  
ZIP 19801-3570



LEGAL MAIL